



Driving progress
through partnership

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March 19, 2025

Via ECF

Hon. Michael J. Roemer, U.S.M.J.
Robert H. Jackson United States Courthouse
2 Niagara Square
Buffalo, NY 14202

Re: Consumer Financial Protection Bureau, et al. v. StratFS, LLC, et al.
Case No. 1:24-cv-00040-EAW-MJR

Dear Judge Roemer:

Reed Smith represents Defendants Ryan Sasson, Daniel Blumkin, Albert Ian Behar, Twist Financial LLC, Duke Enterprises, LLC, and Blaise Investments, LLC (the “Individual Defendants”) in the above matter.

Pending before the Court is the Individual Defendants’ Cross-Motion to Stay the Preliminary Injunction Pending Appeal (ECF 613) (the “Cross-Motion”). The Cross-Motion is set to be heard before Your Honor on April 8, 2025 (ECF 617).

As Your Honor is aware, on April 9, 2025, oral argument on the merits appeal, as well as Ryan Sasson’s Motion to Vacate and Remand, will be taking place before the Second Circuit Court of Appeals.

Accordingly, the Individual Defendants respectfully request that the Cross-Motion be continued (held in abeyance) until after the Second Circuit has issued its ruling with respect to the pending appellate issues. The primary reason for this request is that the Second Circuit’s ruling may moot the pending Cross-Motion before this Court. The Individual Defendants agree, within 10 days of the Second Circuit’s ruling, to either (i) file a reply in further support of the Cross-Motion; or (ii) withdraw the Cross-Motion.

I have conferred with counsel for the plaintiffs regarding this request, and they do not consent. *See Ex. A.*

We thank the Court for its kind attention and consideration.

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Respectfully submitted,

s/Gregory D. Speier

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cc: All Counsel of Record (via ECF)